

HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BRIAN BAKER, a Washington resident,

Plaintiff,

v.

G&I VII REDMOND RETAIL LLC, a
Delaware limited liability company,

Defendant.

NO. 2:19-cv-01182-MJP

STIPULATED MOTION AND
[REDACTED] ORDER FOR STAY OF
CASE FOR PENDING SETTLEMENT
NEGOTIATIONS

NOTE ON MOTION CALENDAR:
Tuesday, October 1, 2019

STIPULATION

Plaintiff Brian Baker and Defendant G&I VII Redmond Retail, LLC (collectively, "Parties"), by and through their respective undersigned attorneys, hereby move on a stipulated and agreed basis for an order temporarily staying all litigation in this case while the Parties engage in settlement negotiations. The parties are attempting to resolve this case at the earliest possible stage to secure the just, speedy, and inexpensive resolution of this action. *See* Fed. R. Civ. P. 1. In support of the Stipulated Motion, the Parties jointly state as follows:

STIPULATED MOTION AND [REDACTED]
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(Civil Action No. 2:19-cv-01182-MJP)

**GORDON REES SCULLY
MANSUKHANI, LLP**
701 5th Avenue, Suite 2100
Seattle, WA 98104
Telephone: 206.695.5100
Facsimile: 206.689.2822

1 1. On July 30, 2019, Plaintiff commenced this civil action by filing his Complaint.
2 Dkt. 1. Defendant has been served with process.

3 2. On October 1, 2019, the Parties through their counsel conferred regarding the
4 possibility of resolving this case through settlement negotiations, including accessibility
5 alterations and the amount of reasonable attorney fees and costs, before undertaking significant
6 litigation and motion practice. It appears that such a resolution is a likely possibility.

7 3. The Parties believe that they can informally exchange necessary information and
8 engage in productive negotiations in 60 days. However, the Parties agree that these negotiations
9 would be compromised by simultaneous discovery and motion practice.

10 Based on the foregoing, the Parties respectfully request the Court to enter an Order:

11 (i) Staying this action for all purposes until December 1, 2019, to enable the parties to
12 focus on and conduct settlement negotiations; and

13 (ii) Scheduling a date for the Parties to file a joint report or other event that will permit
14 the Parties to update the Court on progress of settlement efforts before or at the conclusion of the
15 requested stay.

16 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

17 DATED: Oct. 1, 2019.

GORDON REES SCULLY MANSUKHANI, LLP

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19 By: /s/ Sarah N. Turner

Sarah N. Turner, WSBA #37748
Gordon Rees Scully Mansukhani, LLP
701 5th Avenue, Suite 2100
Seattle, Washington 98104
Tel.: 206.695.5100
Email: Sturner@grsm.com

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23 Attorneys for Defendant
G&I VII REDMOND RETAIL LLC

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GORDON REES SCULLY
MANSUKHANI, LLP
701 5th Avenue, Suite 2100
Seattle, WA 98104
Telephone: 206.695.5100
Facsimile: 206.689.2822

1 DATED: Oct. 1, 2019

WASHINGTON CIVIL & DISABILITY ADVOCATE

2
3 By: /s/Michael Terasaki

4 Conrad Reynoldson, WSBA #48187
5 Michael Terasaki, WSBA #
6 Washington Civil & Disability Advocate
7 3513 NE 45th Street, Suite G
8 Seattle, Washington 98105
9 Tel.: 206.876.8515
10 Email: Conrad@wacda.com
11 Teraskaki@wacda.com

12 Attorneys for Plaintiff

13 **ORDER**

14 Based on the foregoing Stipulation, it is hereby ORDERED that this matter is stayed until
15 December 1, 2019. All case deadlines are extended until after December 1, 2019. It is further
16 ORDERED that the parties file a Joint Report regarding the progress of settlement negotiations
17 on or before December 1, 2019.

18 Dated this 3rd of October, 2019.

19 
20 THE HONORABLE MARSHA J. PECHMAN
21 UNITED STATES DISTRICT JUDGE
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STIPULATED MOTION AND [REDACTED] :
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GORDON REES SCULLY
MANSUKHANI, LLP
701 5th Avenue, Suite 2100
Seattle, WA 98104
Telephone: 206.695.5100
Facsimile: 206.689.2822

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 1, 2019, I electronically filed the foregoing document entitled STIPULATED MOTION AND [PROPOSED] ORDER FOR STAY OF CASE FOR PENDING SETTLEMENT NEGOTIATIONS with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following registered participants and party's counsel of record:

Case Electronic Mail Notice List:

- **Conrad Reynoldson**
conrad@wacda.com; office@wacda.com
- **Michael M Terasaki**
terasaki@wacda.com; michael@terasakilaw.com; felicity@wacda.com

DATED: October 1, 2019.

/s/ Estela Acosta
Estela Acosta, Legal Secretary
eacosta@grsm.com

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**GORDON REES SCULLY
MANSUKHANI, LLP**
701 5th Avenue, Suite 2100
Seattle, WA 98104
Telephone: 206.695.5100
Facsimile: 206.689.2822